

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

Northern AL P L DIVISION

Jennifer Cromartie

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

PLAINTIFF

v. Julia Tutwiler Prison for  
Women, Shanita Bozeman, Tracy Floyd  
Brian Coleman, Brandon Thornton

CASE ACTION NO.

2:19-cv-568-ECM-SMD

JURY DEMAND (MARK ONE)

(x) Terrall Brown, Quinton Goodson, Lagreta  
McClain, Tremaine Baldwin, Napoleon  
Deidra Wright, Sonja Rose

☒ YES

☐ NO

DEFENDANT

EEOC COMPLAINT

1. Plaintiff resides at 6513 Tuscan Ct Montgomery AL 36117

2. Defendant(s)' name(s) Julia Tutwiler Prison for  
Women et. al

Location of principal office(s) of the named defendant(s) 2916 US Hwy  
231 N Wetumpka AL 36092

Nature of defendant(s)' business employees of Julia tutwiler  
Prison for women

Approximate number of individuals employed by defendant(s) 11 (cc)

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for  
employment discrimination. Jurisdiction is specifically conferred on the Court by 42  
U.S.C. §2000e-5. Equitable and other relief are also sought under 42 §2000e-5(g).

4. The acts complained of in this suit concern:

1. ☐ Failure to employ me.
2. ☐ Termination of my employment.
3. ☐ Failure to promote me.

4. ☒ Other acts as specified below: Officer Bozeman was in  
possession of a loaded ALDOC firearm and threatened to  
harm me.

5. Plaintiff is:

- A. ☒ Presently employed by the defendant.  
☐ Not presently employed by the defendant. The dates of employment were \_\_\_\_\_  
 Employment was terminated because: \_\_\_\_\_

- (1) NA Plaintiff was discharged.  
 (2) NA Plaintiff was laid off.  
 (3) NA Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

- A. NA My race.  
 B. NA My religion.  
 C. NA My sex.  
 D. NA My national origin.  
 E. ☒ Other, as specified below: Retaliation

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are) \_\_\_\_\_  
NA

8. The alleged Retaliation discrimination occurred on or about December 18, 2018 - May 2019 (x)

9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows:

I have been employed as a corrections officer since 2010 and assigned to the Julia Tutwiler Women's Prison as a Correctional Sergeant. On or about December 18, 2018, I reported that another subordinate officer, Officer Bozeman, was in possession of a loaded AL Doc firearm and threatened to harm me. Once it was reported I began to be retaliated against in the form of unfavorable job assignments, loss of overtime, mandatory counseling (endorsed by Capt. Gordon) and a host of other unethical treatment and statements. I feel as though this was spearheaded by Warden Lagreta McClain after I identified her actions as a breach of contract by violating several ethical policies. Due to the actions of the parties involved I am not able to receive my next level promotion due to the negative and malice investigation placed against me for inserting my right to sue.

10. The alleged illegal activity took place at Julia Tutwiler Prison for Women

9406 US HWY 231 N Wetumpka AL 36092

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about 05/13/2019.  
I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. The letter was received by me on 05/23/2019

12. I seek the following relief:

- A. ☒ Recovery of back pay.  
B. ☐ Reinstatement to my former job, and any other relief as may be appropriate, including injunctive orders, damages, costs, and attorneys fees.

Date: 08/07/2019

Quinn Cromartie  
Signature of Plaintiff

6513 Tuscan Ct  
Montgomery AL  
361107 334-354-1362  
Address & Telephone Number of Plaintiff